

**+UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:

JUAN ARBOLEDA	:	CHAPTER 13
Debtor	:	
	:	BANKRUPTCY NO. 18-11840

**MOTION TO REINSTATE/REOPEN CASE TO ALLOW DEBTOR TO RECEIVE
DISCHARGE**

Debtor, JUAN ARBOLEDA by and through his attorney, Gary E. Thompson, Esquire, respectfully represents the following:

1. Debtor commenced this case March 19, 2018 by filing the above numbered voluntary Chapter 13 Petition under Title XI, U.S. Code.
2. Debtor completed all payments under the confirmed Chapter 13 Plan.
3. Notices to the Debtor were sent from both counsel and the Court regarding Debtor/s obligation to file a certification regarding domestic support obligations and section 522(q).
4. Debtor's case was closed on October 23, 2023 without the entry of an Order of Discharge.
5. Debtor, s through counsel, has since completed the certification regarding domestic support obligations and section 522 (q). A true and correct copy is attached hereto as Exhibit "A".
6. Debtor has otherwise complied with all the terms and conditions of the Chapter 13 bankruptcy and will benefit from the entry of an Order of Discharge.

WHEREFORE, Debtor requests this Honorable Court for an Order vacating the Order closing this case and reopening Debtor's case to allow for the proper filing of a personal financial management certificate.

Respectfully submitted,

/s/ Gary E. Thompson

GARY E. THOMPSON, ESQ.
Attorney for Debtor

UNITED STATES BANKRUPTCY COURT

Easton District Of PA

In re Juan Arbulon
Debtor

Case No. 18-11840

CHAPTER 13 DEBTOR'S CERTIFICATIONS REGARDING
DOMESTIC SUPPORT OBLIGATIONS AND SECTION 522(q)

Part I. Certification Regarding Domestic Support Obligations (check no more than one)

Pursuant to 11 U.S.C. Section 1328(a), I certify that:

☒ I owed no domestic support obligation when I filed my bankruptcy petition, and I have not been required to pay any such obligation since then.

☐ I am or have been required to pay a domestic support obligation. I have paid all such amounts that my chapter 13 plan required me to pay. I have also paid all such amounts that became due between the filing of my bankruptcy petition and today.

Part II. If you checked the second box, you must provide the information below.

My current address: _____

My current employer and my employer's address: _____

Part III. Certification Regarding Section 522(q) (check no more than one)

Pursuant to 11 U.S.C. Section 1328(h), I certify that:

☒ I have not claimed an exemption pursuant to § 522(b)(3) and state or local law (1) in property that I or a dependent of mine uses as a residence, claims as a homestead, or acquired as a burial plot, as specified in § 522(p)(1), and (2) that exceeds \$189,050* in value in the aggregate.

☐ I have claimed an exemption in property pursuant to § 522(b)(3) and state or local law (1) that I or a dependent of mine uses as a residence, claims as a homestead, or acquired as a burial plot, as specified in § 522(p)(1), and (2) that exceeds \$189,050* in value in the aggregate.

* Amounts are subject to adjustment on 4/01/25, and every 3 years thereafter with respect to cases commenced on or after the date of adjustment.

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Part IV. Debtor's Signature

I certify under penalty of perjury that the information provided in these certifications is true and correct to the best of my knowledge and belief.

Executed on 11/16/23
Date

LS/ JUAN ARBULEDA
Debtor